

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

BAYOU STEEL BD HOLDINGS, LLC, *et al.*,

Debtors.

GEORGE L. MILLER, in his capacity as Chapter 7  
Trustee of BAYOU STEEL BD HOLDINGS,  
L.L.C., *et al.*,

Plaintiff,

vs.

QUALITY MACHINE MANUFACTURING, INC.,

Defendant.

Chapter 11

Case No. 19-12153 (KBO)

(Jointly Administered)

Adv. Proc. No. 21-50219 (KBO)

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF NOTICES AND PAPERS**

**PLEASE TAKE NOTICE** that Morris, Nichols, Arsht & Tunnell LLP and Stewart Robbins Brown & Altazan LLC hereby enter their appearance (this “Notice of Appearance”) in the above-captioned adversary proceeding as counsel to Quality Machine Manufacturing, Inc. (the “Defendant”), pursuant to section 1109(b) of title 11 of the United States Code, rules 2002, 3017(a), 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (as amended, the “Bankruptcy Rules”), and rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and request that copies of any and all notices and papers filed or entered in these cases be given to and served upon the following:

**MORRIS, NICHOLS, ARSHT &  
TUNNELL LLP**

Andrew R. Remming (No. 5120)  
Joseph C. Barsalona II (No. 6102)  
1201 N. Market St., 16th Floor  
Wilmington, DE 19899-1347  
Telephone: (302) 658-9200  
Facsimile: (302) 658-3989  
aremming@morrisnichols.com  
jbarsalona@morrisnichols.com

**STEWART ROBBINS BROWN &  
ALTAZAN LLC**

Paul Douglas Stewart, Jr.  
Brandon A. Brown  
Nicholas Smeltz  
301 Main Street, Suite 1640  
Baton Rouge, LA 70801  
Telephone: (225) 231-9998  
Facsimile: (225) 709-9467  
dstewart@stewartrobbsins.com  
bbrown@stewartrobbsins.com  
nsmeltz@stewartrobbsins.com

**PLEASE TAKE FURTHER NOTICE** that this constitutes not only a request for service of the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, a request for service of all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise, that (1) affects or seeks to affect in any way any rights or interests of any creditor or party in interest in these cases, with respect to (a) the debtors in the above-captioned cases (the “Debtors”) and any related adversary proceedings, whether currently pending or later commenced, (b) property of the Debtors’ estates, or proceeds thereof, in which the Debtors may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the Debtors may seek to use, or (2) requires or seeks to require any act or other conduct by a party in interest.

**PLEASE TAKE FURTHER NOTICE** that this notice of appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive the rights of the Defendant: (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) to have final orders in

a non-core case, proceeding, matter, or controversy entered only after an opportunity to object to proposed findings of fact and conclusions of law and a de novo review by a district court judge; (3) to trial by jury in any case, proceeding, matter, or controversy so triable; (4) to have the reference withdrawn by the United States District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Defendant is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved and preserved.

Dated: April 13, 2021

**MORRIS, NICHOLS, ARSHT AND TUNNELL LLP**

/s/ Joseph C. Barsalona II

Andrew R. Remming (No. 5120)  
Joseph C. Barsalona II (No. 6102)  
1201 N. Market St., 16th Floor  
Wilmington, DE 19899-1347  
Telephone: (302) 658-9200  
Facsimile: (302) 658-3989  
aremming@morrisnichols.com  
jbarsalona@morrisnichols.com

-and-

**STEWART ROBBINS BROWN & ALTAZAN LLC**

Paul Douglas Stewart, Jr.  
Brandon A. Brown  
Nicholas Smeltz  
301 Main Street, Suite 1640  
Baton Rouge, LA 70801  
Telephone: (225) 231-9998  
Facsimile: (225) 709-9467  
dstewart@stewartrobbins.com  
bbrown@stewartrobbins.com  
nsmeltz@stewartrobbins.com

*Counsel to Quality Machine Manufacturing, Inc.*